

FILED

FEB 12 2020

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES MARQUAND,

Defendant.

) INDICTMENT

) **1 : 20 CR 121**

) CASE NO.

) Title 18, United States Code,  
) Sections 2251(a), 2252(a)(2),  
) 2252A(a)(5)(B)

**JUDGE LIOI**

COUNT 1

(Sexual Exploitation of Children, 18 U.S.C. § 2251(a))

The Grand Jury charges:

From on or about July 29, 2019 through on or about July 30, 2019, in the Northern District of Ohio, Eastern Division, Defendant JAMES MARQUAND did use, persuade, induce, entice and coerce a minor (to wit: Minor Victim #1, whose identity is known to the Grand Jury) to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2251(a).

COUNT 2

(Receipt and Distribution of Visual Depictions of Real Minors Engaged In Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(2))

The Grand Jury further charges:

From on or about March 11, 2019 through on or about September 26, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant JAMES MARQUAND

did knowingly receive and distribute, using any means and facility of interstate and foreign commerce, numerous computer files, which files contained visual depictions of real minors engaged in sexually explicit conduct, and which files had been shipped and transported in and affecting interstate and foreign commerce, as defined in Title 18, Section 2256(2), United States Code, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT 3

(Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B))

The Grand Jury further charges:

On or about November 7, 2019, in the Northern District of Ohio, Eastern Division, Defendant JAMES MARQUAND did knowingly possess a Samsung cellular phone that contained child pornography as defined in Title 18, Section 2256(8), United States Code, which child pornography had been shipped and transported in interstate and foreign commerce by any means, including by computer, and which was produced using materials which had been shipped and transported in interstate and foreign commerce by any means, including by computer, and at least one image involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.